

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: ART VAN FURNITURE, LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 20-10553 (CSS) (Jointly Administered)
ALFRED T. GIULIANO, in his capacity as Chapter 7 Trustee of Art Van Furniture, LLC, <i>et al.</i> , Plaintiff, vs. NEW ENGEN, INC., Defendant.	Adv. Proc. No. 22-50205 (CSS)

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING
STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER THE COMPLAINT**

The undersigned hereby certifies as follows:

1. On April 7, 2020, Alfred T. Giuliano, was appointed as the chapter 7 trustee (the “Trustee”) of the Debtors’ bankruptcy estates. On March 1, 2022, the Trustee filed the *Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550* (the “Complaint”) with the U.S. Bankruptcy Court for the District of Delaware (the “Court”) against defendant New Engen, Inc. (the “Defendant” together with Plaintiff, the “Parties”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Art Van Furniture, LLC (9205); AVF Holding Company, Inc. (0291); AVCE, LLC (2509); AVF Holdings I, LLC (2537); AVF Holdings II, LLC (7472); AVF Parent, LLC (3451); Levin Parent, LLC (8052); Art Van Furniture of. Canada, LLC (9491); AV Pure Sleep Franchising, LLC (8968); AVF Franchising, LLC (6325); LF Trucking, Inc. (1484); Sam Levin, Inc. (5198); and Comfort Mattress LLC (4463).

2. The Parties have agreed and entered into a stipulation, subject to this Court's approval, to extend the Defendant's time to answer the Plaintiff's Complaint. Attached hereto as **Exhibit A** is a proposed form of order approving the stipulation. The stipulation is attached as Exhibit 1 to the proposed form of order.

3. Accordingly, the Parties request that this Court enter the proposed form of order.

Dated: April 1, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Andrew W. Caine (CA Bar No. 110345)
Jeffrey P. Nolan (CA Bar No. 158923)
Peter J. Keane (DE Bar No. 5503)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
jnolan@pszjlaw.com
pkeane@pszjlaw.com

*Counsel to Plaintiff Alfred T. Giuliano, Chapter 7
Trustee for the Estates of Art Van Furniture, LLC,
et al.*